• Draft/Potential Questions:

- O Source/Treatment Change:
 - What is the process the primacy agency follows when a PWS wants to change its source? Is there written documentation of this decision between the primacy agency and the PWS? What documentation does the primacy agency request of the PWS before making this change?
 - What is the process the primacy agency follows when a PWS wants to change treatment? Is there written documentation of this decision? What documentation does the primacy agency request of the PWS before changing treatment?
 - What protocol does the primacy agency follow when a consecutive system plans to make a source or treatment change? If the purchasing water was optimized, are they asking the PWS to treat to ensure corrosion control continues in the distribution system?
 - How is the Agency implementing LCR requirements in consecutive distribution systems? Are they establishing WQP at each PWS? Monitoring plans?

Sampling Protocol:

- Does the primacy agency allow pre-stagnation flushing?
- What protocol did the primacy agency establish to review sampling locations and ensure the sites meet the highest Tier classification possible? What documentation was used to identify Tier 1 sampling sites? How often does the primacy agency review sampling plans?
- What guidance does the primacy agency provide regarding sampling pools and retaining samples in the initial monitoring pool vs. new sites? What protocol does the primacy agency provide to PWS in regards to changing or "dropping" sites?
- How is the primacy agency addressing invalidation of samples that might lead to avoiding an action level exceedance?
- Is the primacy agency looking at the timeframe the samples are collected? (June through September and not over three years timeframe)

Invalidation of Samples:

- How does the primacy agency invalidate samples?
- Does the primacy agency provide written justifications for invalidated samples?
- What is the most common reason for invalidating a sample and does it correlate with a sample that yielded a high value? Are PWSs allowed to take high sites out of the sampling pool and discontinue sampling there? Does the primacy agency have replacement options that require valid criteria for invalidating?

Action Taken After ALE:

- How is the primacy agency following up with PWS when they experience an ALE? Is the primacy following up with the PWS to ensure actions are being taken?
- Are the primacy agencies requiring corrosion control while they collect the two rounds of monitoring?
- Are they conducting public education in 60 days?

Waivers

- Is the primacy agency approving waivers for lead sampling?
- If so, what is the protocol for such waivers to be approved?

Transparency

■ Is the primacy agency requesting that PWSs post on LCR sampling information, which includes: sampling protocols, sampling instructions for homeowners, locations of sampling sites, sampling results of all the lead samples collected, not just individual samples, invalidated samples and the reason for it as well as identified Tier 1 sites.